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MEDICIS AESTHETICS, INC., MEDICIS PHARMACEUTICAL CORP.,
VALEANT PHARMACEUTICALS NORTH AMERICA LLC,
VALEANT PHARMACEUTICALS INTERNATIONAL,
VALEANT PHARMACEUTICALS INTERNATIONAL, INC., and GALDERMA
LABORATORIES, L.P.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ALLERGAN USA, INC., and
ALLERGAN INDUSTRIE, SAS,

Plaintiffs,

v.

MEDICIS AESTHETICS, INC.,
MEDICIS PHARMACEUTICAL
CORP., VALEANT
PHARMACEUTICALS NORTH
AMERICA LLC, VALEANT
PHARMACEUTICALS
INTERNATIONAL, VALEANT
PHARMACEUTICALS
INTERNATIONAL, INC., AND
GALDERMA LABORATORIES, L.P.

Defendants.

Case No. 8:13-cv-01436 AG (JPRx)

DISCOVERY MATTER

DECLARATION OF SCOTT B.
HOWARD IN SUPPORT OF JOINT
STIPULATION REGARDING
PLAINTIFFS' MOTION TO COMPEL

Judge: Hon. Jean P. Rosenbluth
Hearing: February 26, 2015
Time: 10: a.m.
Ct rm: A-8th Floor

1 I, Scott B. Howard, declare as follows:

2 1. I am a member of the law firm Patterson Belknap Webb & Tyler
3 LLP, attorneys for the Defendants in the above-captioned case. I am admitted to
4 practice in the State of California *pro hac vice*.
5

6 2. On January 13, 2015, counsel for Plaintiffs took the deposition
7 under oath of Ryan Weldon. Attached hereto as Exhibit 1 is a true and correct copy of
8 excerpts of the official transcript of that deposition.
9

10 3. On December 12, 2014, counsel for Plaintiffs took the deposition
11 under oath of Jeffrey M. Strauss. Attached hereto as Exhibit 2 is a true and correct
12 copy of excerpts of the official transcript of that deposition.
13

14 4. On December 16, 2014, counsel for Plaintiffs took the deposition
15 under oath of Steven J. Knapp. Attached hereto as Exhibit 3 is a true and correct copy
16 of excerpts of the official transcript of that deposition.
17

18 5. Attached hereto as Exhibit 4 is a true and correct copy of
19 Defendants' Second Amended Response to Plaintiffs' Interrogatory No. 13, which
20 was served on Plaintiffs on January 30, 2015.
21

22 6. Attached hereto as Exhibit 5 is a true and correct copy of the Order
23 Denying Plaintiffs' Motion for Leave to File a Third Amended Complaint (Document
24 105), entered by the Hon. Andrew J. Guilford on January 12, 2015.
25

26 I declare, under penalty of perjury, that the foregoing statements
27 are true and correct.
28

1
2 Dated: February 2, 2015

/s/ Scott B. Howard

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on February 5, 2015 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Civil Local Rule 5.4. Any other counsel of record will be served by electronic mail, facsimile and/or overnight delivery.

/s/ Elizabeth M. Flanagan